

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

DANIEL FRANCISCO, ORI  
KATZIN, and FIREARMS POLICY  
COALITION, INC.,

Plaintiffs,

-against-

PETER S. COOKE, JR., in his official capacity as Chief of Police of the Borough of Englishtown Police Department, WILLIAM WICKER, in his official capacity as Chief of Police of the Borough of Oradell Police Department, ANDREW J. BRUCK, in his official capacity as Acting Attorney General of New Jersey, and PATRICK J. CALLAHAN, in his official capacity as Superintendent of the New Jersey State Police, LOURDES LUCAS, in her official capacity as a Judge of the Monmouth County Superior Court and CHRISTOPHER R. KAZLAU, in his official capacity as a Judge of the Bergen County Superior Court,

Defendants.

HON. FREDA L. WOLFSON,  
U.S.D.J.

HON. DOUGLAS E. ARPERT,  
U.S.M.J.

CIVIL ACTION NO. 3:21-cv-14575

**CIVIL ACTION**

**(ELECTRONICALLY FILED)**

Motion Date: September 19, 2022

**DECLARATION OF EDWARD ANDREW PALTZIK IN SUPPORT  
OF MOTION TO WITHDRAW AS COUNSEL**

1. My name is Edward Andrew Paltzik, and I am counsel of record for the

Plaintiffs.

2. I have been admitted to practice law since 2007 when I was admitted to practice in New York. I am currently in good standing and admitted to practice in the following jurisdictions: New York, New Jersey, the Eastern District of New York, the Southern District of New York, the District of New Jersey, the United States Court of Appeals for 2nd, 3rd, 6th, 9th, and Federal Circuits, and the United States Supreme Court.

3. I am currently a Partner at the law firm of Joshpe Mooney Paltzik LLP (“JMP”), which has an office at 1407 Broadway, Suite 4002, New York, NY 10018.

4. Recently, I have been forced to take an indefinite leave from the practice of law due to multiple urgent medical conditions that require sustained and immediate attention. As a result of these medical conditions, my ability to adequately represent clients is materially impacted and I am unable to provide representation at this time and unable to practice law. This has been a difficult time for me and my family. I am able to provide additional information about the nature of my conditions if necessary to the court *in camera*.

5. I am the only Partner at JMP that has the requisite litigation experience and knowledge to serve as counsel of record in this action, and my conditions render me unable to adequately represent the clients or to practice law.

6. In addition, the other partners at JMP are in the process of joining

another law firm, and we plan to discontinue JMP's operation as a law firm.

7. As a result of my urgent medical conditions and my inability to practice law, the unavailability of other counsel in my firm with the requisite experience available to handle this matter, and the fact my firm will cease operations as a law firm in the near future, I am respectfully moving to withdraw as counsel.



---

Edward A. Paltzik